

Where Do We Stand on Standard Conditions 1?

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Operating Permits Section

What we are discussing today

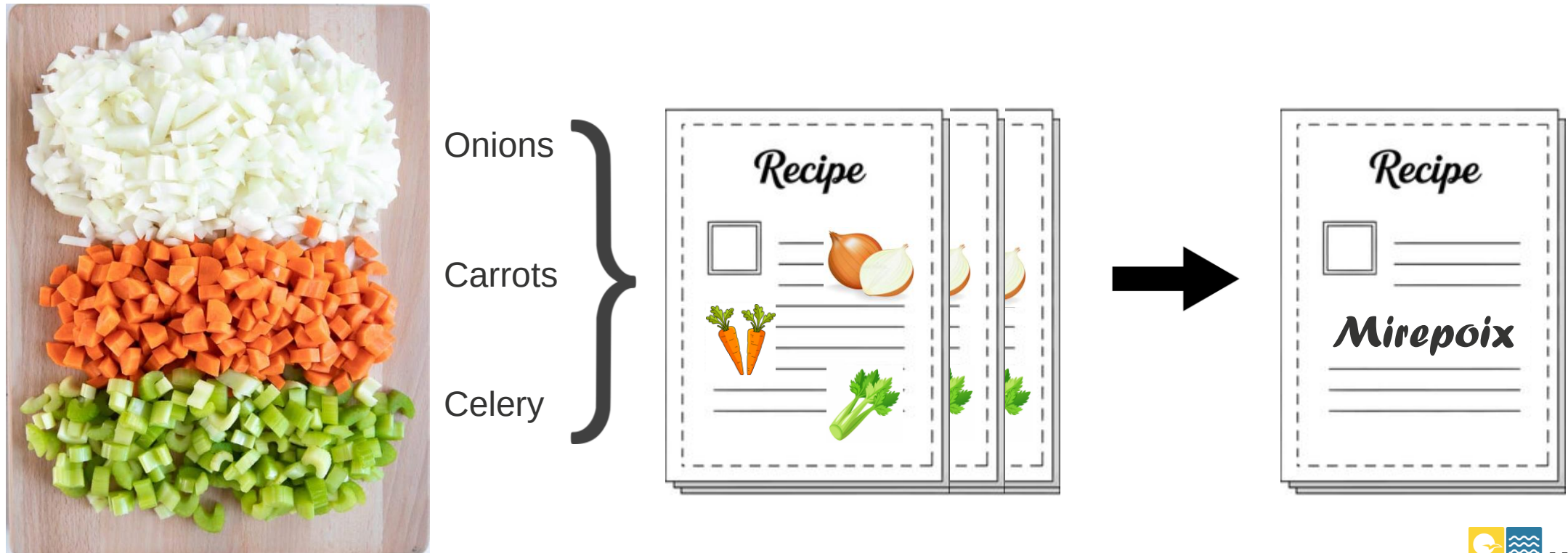
1. The 5 W's of the Standard Conditions 1 Updates

2. Standard Conditions 1 Updates: Questions People May Have



Standard Conditions 1 Updates: 5 W's

- **What** are Standard Conditions?
 - Permit requirements that can be found in *all* permits issued by MoDNR



Without SCs

PERMIT



condition for all permits

condition for all permits

Industry specific permit
condition

Industry specific permit
condition

condition for all permits

Industry specific permit
condition

With SCs

Industry specific permit
condition

Industry specific permit
condition

Industry specific permit
condition

condition for all permits

condition for all permits

condition for all permits

PERMIT



STANDARD CONDITIONS



Standard Conditions 1 Updates: 5 W's

- **Who** does Standard Conditions 1 affect?
 - All permit holders
 - ≈11,000 permits (as of 7/27/26)
 - Almost the same as the population of:
 - Kearney
 - Smithville
 - Bridgeton
 - Excelsior Springs

Standard Conditions 1 Updates: 5 W's

2014

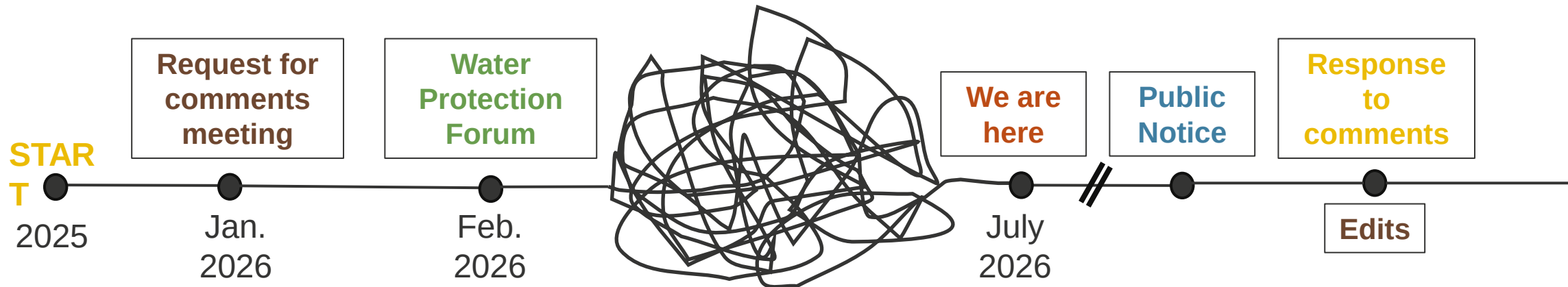
- When were Standard Conditions 1 last updated?



pre-eDMR

Standard Conditions 1 Updates: 5 W's

- Where are we in the editing/updating process?



Standard Conditions 1 Updates: 5 W's

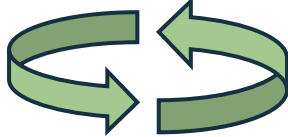
- **Why** are we choosing to update Standard Conditions 1 now?
 - See previous 5 slides



Standard Conditions 1 Updates: Questions People May Have

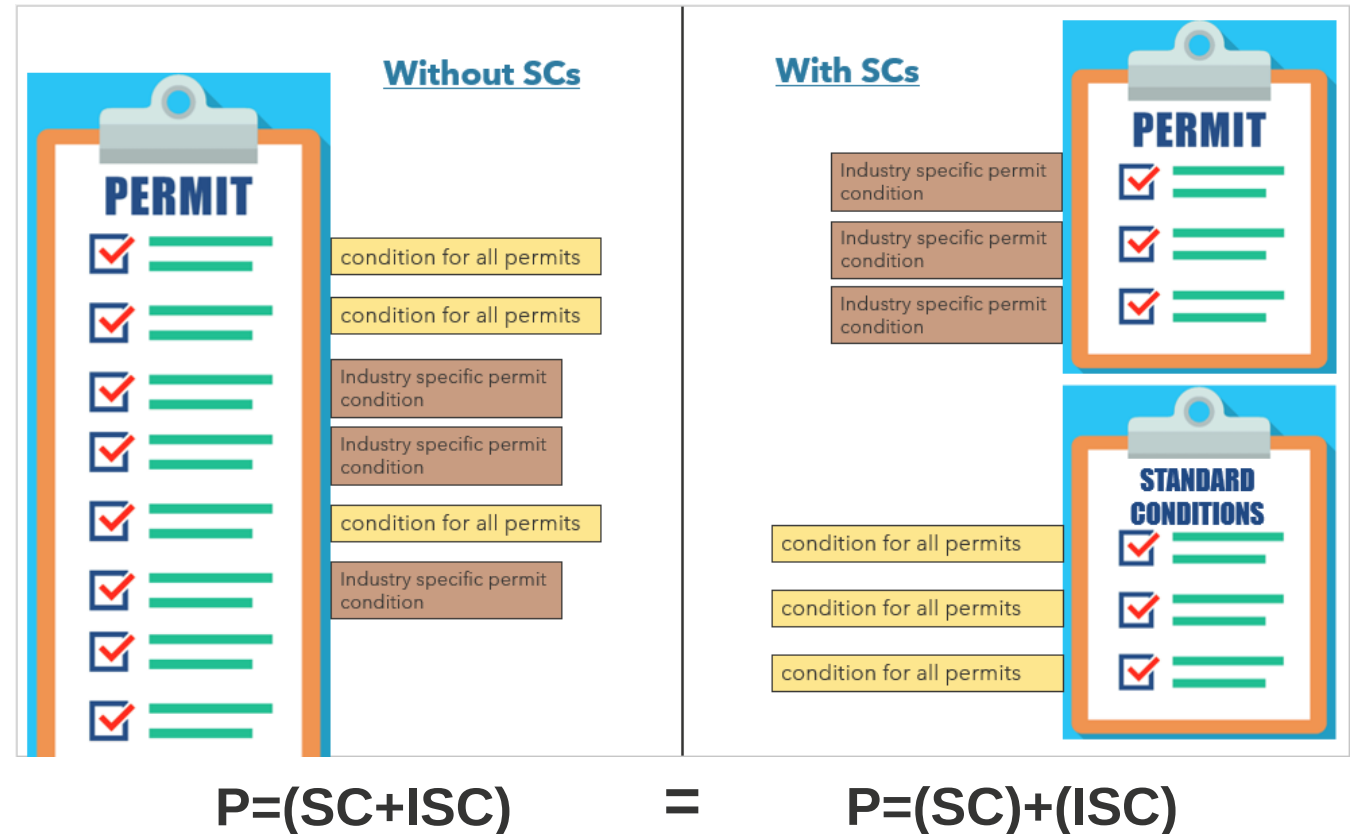


What edits have actually been made?

- Reordering
 - 84 text moves
- Addition of eDMR reporting requirements
- Text updates to match the permitting language that is currently used across the Operating Permits Section
 - Industrial = Domestic
- Deletion of repeating information
- Citations of required permit conditions have been added.

Does SC 1 have to be part of my Permit?

- Yes. In some form or another.
 - Timing of the discussion to have SC1 in the permit or separate is important.
 - Site Specific Permits: renewal during each permit writing
 - General Permits: during Master General Permit renewal, not facility renewal

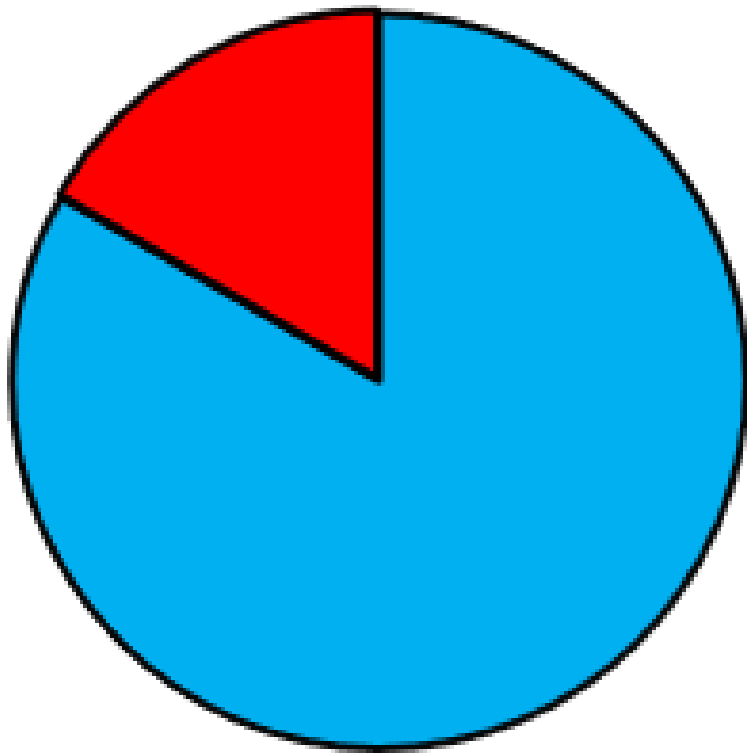


Are you trying to hide the things in SC 1?

- Absolutely not!
- Permits are already broken into sections
 - Facility Description
 - Permitted Features
 - Effluent Limits & Monitoring
 - Renewal Conditions
 - Applicability (General Permits)
 - Exemptions (General Permit)
- We are organizing; like a bookshelf!



Why is all this stuff in permits anyway?



-  Federally Required permit conditions
 - 83%
-  State Required Permit Conditions
 - 17%

Do we really need it all?

YES!

Standard Conditions 1: Section A

A. Sampling, Monitoring, and Recording	1. Sampling Req.	a	40 CFR 122.41(j)
		b	41 CFR 122.41(j)
		c	10 CSR 20-8.140(6)C
		d	10 CSR 20-8.140(6)C
		e	10 CSR 20-8.140(6)C
	2. Monitoring Req.		40 CFR Part 136
		a	
	3. Sampling Times	b	40 CFR Part 136
		a	40 CFR 122.48(b)
		b	40 CFR 122.48(b)
	4. Sample and Monitoring Calculations	(a)	40 CFR 122.41(1)(4)(iii)
	5. Sample Testing and Analysis		
		a	40 CFR 136
		b	40 CFR 122.21(e)(3)

- 40 CFR 122 – Conditions applicable to all permits
- 40 CFR 136 – Guidelines establishing test procedures for the analysis of pollutants
- 10 CSR 20-8.140 – Wastewater Treatment Facilities

 Federally required permit condition

 State required permit condition

Standard Conditions 1: Section B

B. Reporting Requirements	1. Discharge and Monitoring Report Requirements		
		a	10 CSR 20-6.010 (7)B(2)
		b	40 CFR 127
		c	40 CFR 136.1
	2.Changes	a	40 CFR 122. (29,41,42,62)
		b	40 CFR 122.42 (a)(1-2)
	3. Reporting Non-Compliance	a	40 CFR 122.41(1)(6)
		b	40 CFR 122.41(1)(2)
		c	40 CFR 122.41(1)(7)
	4. Record Retention	(a)	41 CFR 122.41(j)

- 10 CSR 20-6.010 – Construction and operating permits
- 40 CFR 127 – NPDES electronic reporting

 Federally required permit condition

 State required permit condition

Standard Conditions 1: Section C

C. Bypass/ Upset Requirements	1. Bypass Requirements	a	40 CFR 403.17(b)
		b	40 CFR 403.17(b)
		c	40 CFR 403.17(c-d)
	2. Upset Requirements	a	40 CFR 403.16(b)
		b	40 CFR 403.16(c)
		c	40 CFR 403.16(d)

- 40 CFR 403 – General pretreatment regulations for existing and new sources of pollution

 Federally required permit condition

 State required permit condition

Standard Conditions 1: Section D

- RSMO 644.076 – Unlawful acts prohibited – false statements and negligent acts prohibited – penalties – exception

D. Required Permit Conditions	1. Proper Operation and Maintenance	a	40 CFR 122.41(e)
	2. Permit Actions	a	40 CFR 122.41(f)
		b	41 CFR 122.41(f)
	3. Signatory Requirement	a	40 CFR 122.22 (a)
		b	40 CFR 122.22 (b)
		c	40 CFR 122.41 (k)
		d	RSMO 644.076
	4. Property Rights	(a)	40 CFR 122.41 (g)
	5. Inspection and Entry	(a)	40 CFR 122.41 (i)
	6. Toxic Pollutants	(a)	40 CFR 122.41 (a)
	7. Severability	(a)	40 CFR 122.19
	8. Permittee Duties	a	40 CFR 122.41(a)
			41 CFR 122.41(a) &
		b	10 CSR 20-6.010 (7)(C)
		c	42 CFR 122.41(d)
	9. Facility Closure and Permit Modification/Termination	d	43 CFR 122.41(h&l)
		a	10 CSR 20-6.010 (12)
			10 CSR 20-6.010 (11) &
		b	40 CFR 122.41 (1)(3)

 Federally required permit condition

 State required permit condition

Standard Conditions 1: Section E

E. Compliance and Enforcement	1. Illegal Activities	a b	40 CFR 122.41 (j) RSMO 644.076
	2. Failure to Pay Fees	(a)	RSMO 644.054-055
	3. Need to Halt or Reduce Activity Not a Defense	(a)	40 CFR 122.41(c)

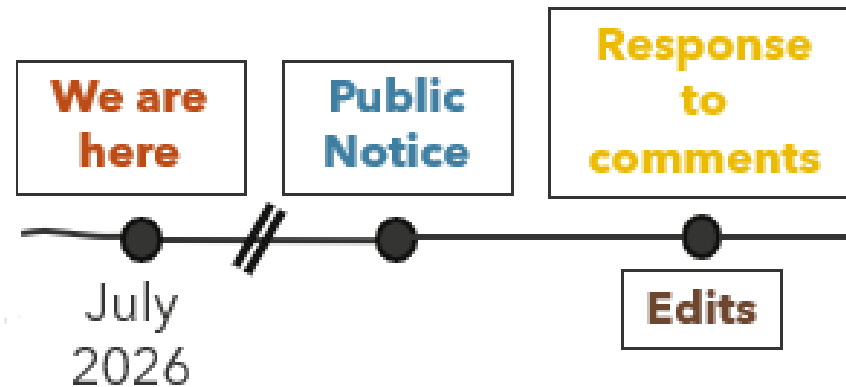
- RSMO 644.054 – Fees, billing and collection - ...
- RSMO 644.055 – Fees, nonpayment - penalty

 Federally required permit condition

 State required permit condition

What comes next?

- Continued stakeholder engagement
- More edits based on comments and feedback



Thank you!

Please reach out with any comments or questions on Standard Conditions 1

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